

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
LUFKIN DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	Civil No. 9:13-cv-58
	§	
\$44,698.00 IN UNITED STATES	§	
CURRENCY	§	
Defendant.	§	

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

Nature of the Action

1. This is an action to forfeit property to the United States pursuant to 18 U.S.C. § 981(a)(1)(A).

Defendant In Rem

2. The defendant property is \$44,698.00 in United States Currency (Defendant Property). Officers with the Nacogdoches Police Department seized the Defendant Property on October 30, 2012. The Defendant Property is currently in the custody of the United States Internal Revenue Service where it will remain during the pendency of this action.

Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has in rem jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

#### Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to the following statute:  
18 U.S.C. § 981(a)(1)(A) because it constitutes property involved in a violation of 18 U.S.C. § 1956 or 1957 or is property traceable to such violation.

#### Facts

7. The Defendant Property is subject to forfeiture based on the following facts:  
On October 30, 2012, local Officers stopped a 2012 Chevrolet Impala, bearing Alabama license plates, for a routine traffic violation in Nacogdoches, Texas. The driver, Lamar Shaw, produced a Louisiana driver's license. While writing a warning ticket for speeding, Shaw explained that he was travelling to Houston to purchase a 1987 Cutlass automobile that he had found on Craig's list. When asked specifics about the vehicle, Shaw was unable to provide a phone number or address, which seemed suspicious.

The Officer asked the passenger, identified as Brieon O'Neal, to provide the car registration. He reached into the center console and retrieved a rental agreement, which indicated that the vehicle was overdue for return and rented by a female who was listed as the only driver.

While retrieving the rental agreement, the Officer noticed a large bundle of currency in the console, which added to suspicion. The Officer then questioned the passenger. He had no

idea here they were going and thought that they were going to buy a car. After obtaining permission to search, the Officer located another large bundle of currency hidden inside the dash of the vehicle. Shaw denied any knowledge of the currency, which totaled \$39,085.00. When given the opportunity, Shaw was unable to locate the alleged vehicle he intended to purchase from Craig's list.

Because of the suspicious story, the large amount of currency, and the denial of ownership of the currency, the Officers concluded that the money was intended for use in illegal drug activity.

#### Potential Claimants

8. The only known potential claimants to the Defendant Property are Tony O'Neal, represented by Shante' Wells, Washington & Wells, Attorneys at Law, 1700 Irving Place, Shreveport, Louisiana 71101; Keaton Lamar Shaw, 509 Fuller Street, Shreveport, Louisiana 71108; and Briceon Jarell O'Neal, 3817 Baxter Street, Shreveport, Louisiana, 71109.

#### Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States, and order any other relief that the Court deems appropriate.

Respectfully submitted,

JOHN M. BALES  
UNITED STATES ATTORNEY

/s/

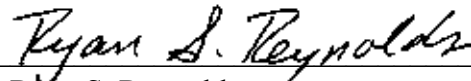
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**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I, Ryan S. Reynolds, hereby state that:

1. I am a Special Agent with the Internal Revenue Service.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, reading "Ryan S. Reynolds", is written over a horizontal line.

Ryan S. Reynolds  
Special Agent  
Internal Revenue Service

Dated: March 13, 2013.